

CERTIFICATE OF SERVICE

I, Jonathan R. Cavalier, hereby certify that I served upon all counsel of record true and correct copies of Defendants The Middle East Forum, Mr. Daniel Pipes and Mr. Greg Roman's Omnibus Motion for Summary Judgment, along with their Memorandum of Law in Support, Statement of Undisputed Material Facts, and Proposed Order via ECF filing.

/s/ Jonathan R. Cavalier

Jonathan R. Cavalier